

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT CURRY,

Plaintiff,

v.

UNITED PARCEL SERVICE, INC.,
TEAMSTERS LOCAL 623,

Defendants.

Civil Action No. 2:17-cv-02331-GJP

**DEFENDANT UNITED PARCEL SERVICE INC.'S REPLY TO
PLAINTIFF'S OPPOSITION AND IN FURTHER SUPPORT OF ITS
PETITION FOR ATTORNEYS' FEES AND COSTS**

/s/ Gary M. Tocci _____

Gary M. Tocci, Esq.
Molly Q. Campbell, Esq.
Reed Smith LLP
Three Logan Square
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Philadelphia, PA 19103
P: (215) 851-8100

*Counsel for Defendant
United Parcel Service, Inc.*

September 20, 2017

Because Plaintiff's Opposition misstates various legal principles, misapplies the law, and is generally filled with misleading legal argument, Defendant United Parcel Service, Inc. ("UPS"), respectfully submits this Reply Brief in response to Plaintiff's Omnibus Response ("Opposition") to UPS's Petition for Attorney's Fees and Costs ("Petition").

I. LEGAL ARGUMENT

A. UPS Timely Filed Its Petition For Attorneys' Fees And Costs

Pursuant to the Court's August 30, 2017 Order, UPS timely filed its Petition for Attorneys' Fees and Costs on September 14, 2017. (Doc. Nos. 37, 38). UPS's initial filing inadvertently omitted its Itemization of Attorneys' Fees ("Itemization"), but a corrected copy was submitted and replaced by the ECF clerk the morning of September 15th. Plaintiff's counsel has not suggested that he suffered any prejudice from this unintended omission, nor could he. Not only did Plaintiff's counsel receive all the necessary information on September 14, 2017, (see Email from Reed Smith to Plaintiff's Counsel forwarding the Itemization, attached hereto as **Exhibit 1**), but he also filed his opposition three days before the Court ordered deadline of September 21, 2017.

B. There Is Appropriate Documentation To Support UPS's Counsel's Billing Rates

UPS's Petition for Attorneys' Fees and Costs included the requisite information and affidavits, and complied with the rules. Contrary to Plaintiff's position that a third party affidavit is required to establish reasonableness (see Doc. No. 40 at 4), this Court has granted fee petitions based solely on the lead counsel's affidavit. *See, e.g., Zeffiro v. First Pa. Bank, N.A.*, 574 F. Supp. 443, 445 (E.D. Pa. 1983). Regardless, as described in Plaintiff's cited case law, "[t]his burden [of establishing attorneys' billing rates] is normally addressed by affidavits prepared by the prevailing party's attorneys and other attorneys in the relevant legal community." *Walker v.*

Gruver, Nos. 1:11-CV-1223, 1:11-CV-1224, 2013 WL 5947623, at *3 (M.D. Pa. Nov. 5, 2013). Here, UPS provided the declaration of its lead counsel, Gary Tocci – the prevailing party’s attorney – and Teamsters Local 623 provided the prevailing rates within the relevant legal community. (Doc. No. 39 at 11).

“The fee schedule established by Community Legal Services, Inc. (“CLS”) has been approvingly cited by the Third Circuit as being well developed and has been found by [the Eastern District of Pennsylvania] to be a fair reflection of the prevailing market rates in Philadelphia.” *Maldonado v. Houston*, 256 F.3d 181, 187 (3d Cir. 2001) (alteration in original); *see also Berg Chilling Sys., Inc. v. Hull Corp.*, No. 00-5075, 2005 WL 67081, at *3 (E.D. Pa. Jan. 11, 2005) (“Courts in this District frequently look to the Community Legal Services, Inc.’s fee schedule (“CLS fee schedule”) as a fair reflection of prevailing market rates.”). Therefore, UPS has met its burden of establishing that its counsel’s billing rates are reasonable.

C. Plaintiff’s Counsel Does Not Specifically Challenge The Reasonableness Of UPS’s Rates, Hours, Or Overall Attorneys’ Fees And Costs¹

Within the Third Circuit, once the moving party has produced adequate documentation of its attorneys’ fees request, “[t]he burden then shifts to the party opposing the fee application to produce affidavits or other submissions that create an issue as to the reasonableness of the requested hourly rate.” *Disciullo v. D’Ambrosio Dodge, Inc.*, No. 06-1775, 2008 WL 4287319, at *2 (E.D. Pa. Sept. 16, 2008). A party responding to an attorneys’ fee petition must oppose the petition “by affidavit or brief with *sufficient specificity* to give fee applicants notice” of its

¹ Pursuant to the Court’s August 30, 2017 Order, UPS apportioned its fees and appropriately only sought reimbursement for those attorneys’ fees and costs “because of Curry’s filing of the Amended Complaint, (ECF No. 16.” (Doc. No. 37). UPS’s arguments and supporting documentation as to why UPS’s counsel’s rates and hours are reasonable are thoroughly addressed in its Petition and UPS hereby incorporates these arguments as if fully set forth herein. (Doc. No. 38). UPS respectfully defers to the Court to determine attorneys’ fees and cost that are reasonable under the circumstances.

objections. *Rode v. Dellarciprete*, 892 F.2d 1177, 1183 (3d Cir. 1990) (emphasis added). The Third Circuit further instructs:

[T]he adverse party's submissions cannot merely allege in general terms that the time spent was excessive. In order to be sufficient, the briefs or answers challenging the fee request must be clear in two respects. First, they must generally identify the type of work being challenged, and second, they must specifically state the adverse party's grounds for contending that the hours claimed in that area are unreasonable. The briefs must be specific and clear enough that the fee applicants have a fair chance to respond and defend their request.

Bell v. United Princeton Props., Inc., 884 F.2d 713, 720 (3d Cir. 1989) (footnote omitted).

Plaintiff's opposition does not specifically challenge the reasonableness of the rates, hours, or overall attorneys' fees and costs detailed at length in UPS's Petition. Instead, he makes broad statements that the fees were not "causally attendant to the sanctioned conduct and/or are duplicative, excessive and not reasonable and necessary" because there were "[c]lient and opposing counsel communications" and entries included descriptions like "[e]diting, strategizing, revisions, and preparations." (Doc. No. 40 at 7). Third Circuit law is clear, that "the district court may not award less in fees than requested unless the opposing party makes specific objections to the fee request." See *United States v. Eleven Vehicles, Their Equip. & Accessories*, 200 F.3d 203, 211 (3d Cir. 2000).

II. CONCLUSION

For the reasons set forth above, as well as those set forth in UPS's Petition for Attorneys' Fees and Costs, UPS respectfully requests that this Court grant its Petition and enter an Order awarding its attorneys' fees and costs in its favor.

Respectfully submitted,

/s/ Gary M. Tocci
Gary M. Tocci, Esq.
Molly Q. Campbell, Esq.

Reed Smith LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
P: (215) 241-7953

*Counsel for Defendant
United Parcel Service, Inc.*

Dated: September 20, 2017

EXHIBIT 1

Ashe, Kristen M.

From: Ashe, Kristen M.
Sent: Thursday, September 14, 2017 10:01 PM
To: 'mweisberg@weisberglawoffices.com'
Cc: Tocci, Gary M.; Campbell, Molly Q.
Subject: FW: Activity in Case 2:17-cv-02331-GJP CURRY v. UNITED PARCEL SERVICE, INC et al Motion for Attorney Fees
Attachments: Curry Fee Petition _Itemization of Attorneys' Fees.pdf

Matthew,

Please see the attached Itemization of Attorneys' Fees, which was inadvertently omitted from UPS's Petition for Attorneys' Fees and Costs filed this afternoon. We will amend our filing tomorrow.

Best,
Kristen

Kristen Ashe
215.851.8255
kashe@reedsmith.com
Reed Smith LLP

From: Matthew B. Weisberg, Esq. <mweisberg@weisberglawoffices.com>
Sent: Thursday, September 14, 2017 5:18 PM
To: Tocci, Gary M.
Subject: Fwd: Activity in Case 2:17-cv-02331-GJP CURRY v. UNITED PARCEL SERVICE, INC et al Motion for Attorney Fees

I don't see your itemization referenced below appended?

----- Forwarded message -----

From: <ecf_paed@paed.uscourts.gov>

Date: Thu, Sep 14, 2017 at 4:45 PM

Subject: Activity in Case 2:17-cv-02331-GJP CURRY v. UNITED PARCEL SERVICE, INC et al Motion for Attorney Fees

To: paedmail@paed.uscourts.gov

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United States District Court
Eastern District of Pennsylvania

Notice of Electronic Filing

The following transaction was entered by TOCCI, GARY on 9/14/2017 at 4:45 PM EDT and filed on 9/14/2017

Case Name: CURRY v. UNITED PARCEL SERVICE, INC et al

Case Number: [2:17-cv-02331-GJP](#)

Filer: UNITED PARCEL SERVICE, INC

WARNING: CASE CLOSED on 08/30/2017

Document Number: [38](#)

Docket Text:

MOTION for Attorney Fees filed by UNITED PARCEL SERVICE, INC. Memorandum, Declaration and Certificate of Service. (Attachments: # (1) Memorandum, # (2) Exhibit A and B, # (3) Text of Proposed Order)(TOCCI, GARY)

2:17-cv-02331-GJP Notice has been electronically mailed to:

GARY M. TOCCI gtocci@reedsmit.com, drzepela@reedsmit.com,
eselfridge@reedsmit.com, gary-tocci-9695@ecf.pacerpro.com, reed-smith-2312@ecf.pacerpro.com

LISA LESHINSKI lleshinski@freedmanlorry.com, kgiordano@freedmanlorry.com

MATTHEW B. WEISBERG mweisberg@weisberglawoffices.com

MOLLY QUINN CAMPBELL mqcampbell@reedsmit.com, beth-selfridge-4248@ecf.pacerpro.com, eselfridge@reedsmit.com

NEAL GOLDSTEIN ngoldstein@freedmanlorry.com, kgiordano@freedmanlorry.com,
mmcgrath@freedmanlorry.com

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Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=9/14/2017] [FileNumber=15051945-0] [47b8fa54915bb7c3243c2db555c67eba7c9756e9830309013d213ad6974e67fea9efb304471d7ae2d8bc7452fb805a5588ef41239b5b099726f7d61795c46401]]

Document description: Memorandum

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=9/14/2017] [FileNumber=15051945-1] [989f1a5eecf69664b9487246015e04b2c3ceaa3f3050c3055a1b81b1554fb5cbe5557ab429e8f7315b4e0401f7b35fb94538c878bb0ecd299ca91abb41e19e1a]]

Document description: Exhibit A and B

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=9/14/2017] [FileNumber=15051945-

2] [70a30ebbb719c8bda5c937035648df7f7dfdfae16359cc2ec06ae1a1f53c71b0c7
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Document description:Text of Proposed Order

Original filename:n/a

Electronic document Stamp:

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3] [468beab3a68925cc16f4faf91a8c2a580859e81add9b8f14aab80ed7d7bfd9f2e
dbbf270567d84e3be4269f5c30ac3138dd4072503daa63297ff759aa577e6b]]

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"Murum aries attigit"

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Consumer Rights and Class Actions;
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Legal Malpractice.

+Kindly send all attachments via Hard-Copy (we cannot read attachments via blackberry)

Matthew B. Weisberg, Esq.

Weisberg Law

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C: 215-370-7500
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Itemization of Attorneys' Fees

TK Name	TK Title	Invoice #	Work Date	Hours Billed	Rate	Fees Billed	Time Narrative
Tocci, Gary M.	Partner	2948133	7/3/2017	0.50	\$320.00	\$160.00	Review and analyze Plaintiff's Amended Complaint and issue research instructions.
Tocci, Gary M.	Partner	2948133	7/5/2017	0.70	\$320.00	\$224.00	Review and analyze newly filed 73-paragraph Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/5/2017	0.60	\$320.00	\$192.00	Strategize UPS's response to Plaintiff's Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/5/2017	1.20	\$320.00	\$384.00	Review and analyze Plaintiff's Amended Complaint and any issues concerning case strategy and motion to dismiss arguments.
Ashe, Kristen M.	Jr. Associate	2948133	7/5/2017	0.70	\$320.00	\$224.00	Research and analyze Third Circuit case law on viability of moving for sanctions against Plaintiff's counsel and summarize same.
Tocci, Gary M.	Partner	2948133	7/5/2017	0.60	\$320.00	\$192.00	Teleconference with M. Campbell and K. Ashe to discuss strategy for addressing Plaintiff's Amended Complaint and issue research instructions to K. Ashe.
Tocci, Gary M.	Partner	2948133	7/5/2017	1.20	\$320.00	\$384.00	Strategize UPS's response to Amended Complaint in light of Plaintiff's outstanding Motion to Remand.
Campbell, Molly Q.	Sr. Associate	2948133	7/6/2017	0.50	\$320.00	\$160.00	Communications with counsel for co-defendant.
Campbell, Molly Q.	Sr. Associate	2948133	7/6/2017	1.20	\$320.00	\$384.00	Review and analyze Local 623's opposition to Plaintiff's Motion to Remand for possible additions to UPS's Motion to Dismiss the Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/6/2017	0.40	\$320.00	\$128.00	Review and analyze Plaintiff's Second Amended Complaint.
Ashe, Kristen M.	Jr. Associate	2948133	7/6/2017	2.20	\$320.00	\$704.00	Research and analyze Third Circuit case law on viability of sanctions against Plaintiff's counsel and summarize same.
Tocci, Gary M.	Partner	2948133	7/6/2017	0.40	\$320.00	\$128.00	Analyze factual allegations in Amended Complaint, specifically regarding Atlantic area panel hearing.
Tocci, Gary M.	Partner	2948133	7/6/2017	0.80	\$320.00	\$256.00	Analyze factual and legal allegations in Amended Complaint and compare to original Complaint.
Ashe, Kristen M.	Jr. Associate	2948133	7/7/2017	1.60	\$320.00	\$512.00	Research and analyze Third Circuit case law interpreting the award of sanctions pursuant to 28 U.S.C. 1927 and Local Rule 83.6.1
Ashe, Kristen M.	Jr. Associate	2948133	7/8/2017	0.30	\$320.00	\$96.00	Research and analyze Third Circuit case law interpreting the award of sanctions pursuant to 28 U.S.C. 1927 and Local Rule 83.6.1
Ashe, Kristen M.	Jr. Associate	2948133	7/9/2017	0.90	\$320.00	\$288.00	Prepare and draft UPS's Motion to Dismiss Amended Complaint.
Ashe, Kristen M.	Jr. Associate	2948133	7/10/2017	1.30	\$320.00	\$416.00	Prepare and draft UPS's Motion to Dismiss Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/10/2017	0.70	\$320.00	\$224.00	Communications with counsel for co-defendant.
Ashe, Kristen M.	Jr. Associate	2948133	7/12/2017	4.50	\$320.00	\$1,440.00	Edit and revise UPS's Motion to Dismiss Amended Complaint.
Ashe, Kristen M.	Jr. Associate	2948133	7/13/2017	0.60	\$320.00	\$192.00	Edit and revise UPS's Motion to Dismiss Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/13/2017	1.20	\$320.00	\$384.00	Edit and revise UPS's Motion to Dismiss Amended Complaint.
Ashe, Kristen M.	Jr. Associate	2948133	7/17/2017	0.80	\$320.00	\$256.00	Edit and revise UPS's Motion to Dismiss Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/18/2017	0.10	\$320.00	\$32.00	Communications with client.
Campbell, Molly Q.	Sr. Associate	2948133	7/18/2017	1.30	\$320.00	\$416.00	Review Local 623's Motion to Dismiss the Amended Complaint.
Campbell, Molly Q.	Sr. Associate	2948133	7/19/2017	0.80	\$320.00	\$256.00	Review Local 623's Motion for Sanctions Against Plaintiff's Counsel.
Tocci, Gary M.	Partner	2948133	7/20/2017	0.70	\$320.00	\$224.00	Address issues regarding Local 623's Motion to Dismiss filings.
Tocci, Gary M.	Partner	2948133	7/26/2017	0.20	\$320.00	\$64.00	Strategize UPS's Reply Brief in support of Motion to Dismiss Amended Complaint and issue instructions.
Campbell, Molly Q.	Sr. Associate	2948133	7/26/2017	0.40	\$320.00	\$128.00	Communications with counsel for co-defendant.

TK Name	TK Title	Invoice #	Work Date	Hours Billed	Rate	Fees Billed	Time Narrative
Campbell, Molly Q.	Sr. Associate	2948133	7/27/2017	0.90	\$320.00	\$288.00	Review and analyze plaintiff's opposition to motion to dismiss and motion for sanctions.
Tocci, Gary M.	Partner	2948133	7/27/2017	0.50	\$320.00	\$160.00	Address issues for reply to Plaintiff's opposition to motion to dismiss.
Tocci, Gary M.	Partner	2948133	7/31/2017	0.30	\$320.00	\$96.00	Strategize UPS's Reply Brief in support of Motion to Dismiss Amended Complaint and outline issues for discussion with M. Campbell and K. Ashe.
Ashe, Kristen M.	Jr. Associate	2948133	7/31/2017	1.50	\$320.00	\$480.00	Prepare and draft UPS's reply to plaintiff's opposition to motion to dismiss.
Ashe, Kristen M.	Jr. Associate	2957046	8/01/2017	1.60	\$320.00	\$512.00	Edit and revise UPS's Reply Brief.
Ashe, Kristen M.	Jr. Associate	2957046	8/2/2017	4.90	\$320.00	\$1,568.00	Edit and revise UPS's Reply Brief.
Campbell, Molly Q.	Sr. Associate	2957046	8/2/2017	2.50	\$320.00	\$800.00	Draft and revise UPS's Reply Brief in support of the motion to dismiss.
Campbell, Molly Q.	Sr. Associate	2957046	8/3/2017	0.90	\$320.00	\$288.00	Review and analyze Local 623's reply to plaintiff's opposition to motion to dismiss.
Ashe, Kristen M.	Jr. Associate	2957046	8/3/2017	2.10	\$320.00	\$672.00	Key cite and proofread UPS's Reply Brief to Plaintiff's Opposition to Motion to Dismiss Amended Complaint.
Ashe, Kristen M.	Jr. Associate	2957046	8/2/2017	1.60	\$320.00	\$512.00	Edit and revise UPS's Reply Brief.
Tocci, Gary M.	Partner	2957046	8/4/2017	0.50	\$320.00	\$160.00	Review Local 623's filings regarding Union's reply on motion to dismiss and then on sanctions and address strategy regarding Plaintiff's counsel's new letter to Court.
Campbell, Molly Q.	Sr. Associate	2957046	8/7/2017	0.30	\$320.00	\$96.00	Review and analyze Judge Pappert's order regarding sanctions motion and oral argument on the pending motions and strategize re: same.
Campbell, Molly Q.	Sr. Associate	2957046	8/7/2017	0.20	\$320.00	\$64.00	Communications with client.
Campbell, Molly Q.	Sr. Associate	2957046	8/7/2017	1.80	\$320.00	\$576.00	Prepare materials in preparation for oral argument.
Tocci, Gary M.	Partner	2957046	8/9/2017	1.00	\$320.00	\$320.00	Review preparation notes for oral argument on Plaintiff's Motion to Remand; motions to dismiss; and motion for sanctions against Plaintiff's counsel.
Campbell, Molly Q.	Sr. Associate	2957046	8/9/2017	1.50	\$320.00	\$480.00	Draft and revise outline in preparation for oral argument.
Tocci, Gary M.	Partner	2957046	8/10/2017	0.30	\$320.00	\$96.00	Communications with client.
Tocci, Gary M.	Partner	2957046	8/10/2017	0.80	\$320.00	\$256.00	Outline pleadings from Curry I and Curry II to prepare for oral argument on motion to dismiss and other issues on August 16.
Tocci, Gary M.	Partner	2957046	8/13/2017	2.50	\$320.00	\$800.00	Review two binders of materials to prepare for oral argument on August 16, including all pleadings, outlines, case authority on motion to remand, motion to dismiss, and motion for sanctions.
Tocci, Gary M.	Partner	2957046	8/14/2017	0.50	\$320.00	\$160.00	Review case authority regarding preemption in preparation for oral argument on motion to dismiss.
Tocci, Gary M.	Partner	2957046	8/14/2017	0.80	\$320.00	\$256.00	Prepare outline for oral argument, specifically on 28 U.S.C. 1927 sanctions issues.
Campbell, Molly Q.	Sr. Associate	2957046	8/14/2017	0.30	\$320.00	\$96.00	Strategize oral argument position and review Plaintiff's case law and arguments.
Tocci, Gary M.	Partner	2957046	8/14/2017	0.80	\$320.00	\$256.00	Prepare outline for oral argument, specifically on motion to remand issues.
Tocci, Gary M.	Partner	2957046	8/15/2017	1.00	\$320.00	\$320.00	Prepare for oral argument relative to Plaintiff's Motion to Remand, including review of case law, updating case law cited by plaintiff, and outline points to raise at argument.
Tocci, Gary M.	Partner	2957046	8/15/2017	1.20	\$320.00	\$384.00	Prepare for oral argument, specifically on motion to dismiss, including review of case authority, updating case authority, and all issues including statute of limitations defense.
Campbell, Molly Q.	Sr. Associate	2957046	8/15/2017	0.60	\$320.00	\$192.00	Communications with counsel for co-defendant.
Tocci, Gary M.	Partner	2957046	8/16/2017	0.80	\$320.00	\$256.00	Prepare for oral argument on motion for sanctions under 28 U.S.C. 1927.
Tocci, Gary M.	Partner	2957046	8/16/2017	0.80	\$320.00	\$256.00	Prepare for oral argument on motion to dismiss.

TK Name	TK Title	Invoice #	Work Date	Hours Billed	Rate	Fees Billed	Time Narrative
Campbell, Molly Q.	Sr. Associate	2957046	8/16/2017	0.20	\$320.00	\$64.00	Prepare for oral argument by strategizing responses to possible questions.
Tocci, Gary M.	Partner	2957046	8/16/2017	0.80	\$320.00	\$256.00	Prepare for oral argument on motion to remand.
Tocci, Gary M.	Partner	2957046	8/16/2017	1.50	\$320.00	\$480.00	Attend oral argument.

\$19,648.00